

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

AMAZON.COM, INC.,

Plaintiff,

v.

STRAIGHT PATH IP GROUP, INC.,

Defendant.

Civil Action No. 1:15-cv-682

**JOINT STIPULATION REGARDING  
REPRESENTATIVE ACCUSED PRODUCTS**

Pursuant to Section V of the Revised Joint Proposed Discovery Plan [Doc. 97], approved on Sep. 18, 2017 in the Rule 16(b) the Scheduling Order [Doc. 108], Amazon.com, Inc. (“Amazon”) and Straight Path IP Group, Inc. (“Straight Path”), by and through their counsel of record, hereby submit the following Joint Stipulation of Representative Accused Products.

WHEREAS, Straight Path has accused Amazon of infringing U.S. Patent Numbers 6,009,469, 6,108,704, and 6,131,121 (the “Asserted Patents”); and

WHEREAS, in Amazon’s Motion to Intervene And To Sever and Stay Claims as to the Amazon Instant Video Service filed in Case No. 1:13-cv-00934-AJT-IDD (Doc. 156), Amazon represented that the accused Amazon Video/Amazon Instant Video service and application (collectively, “Amazon Video”) was available on numerous devices; and

WHEREAS, Straight Path has served discovery requests on Amazon in this matter relating to the design, development, structure, and operation of all versions of Amazon Video; and

WHEREAS, on September 22, 2017, Straight Path served its initial infringement contentions claim charts, which charted Amazon Video on the LG 47LA6900 television; and

WHEREAS, the parties desire to conserve time and resources expended in satisfying their discovery obligations in this matter.

NOW, THEREFORE, the parties stipulate as follows:

1. Straight Path and Amazon by and through their designated counsel, with respect to determining infringement or noninfringement of the asserted claims of the Asserted Patents, hereby agree and stipulate that Amazon Video on the LG 47LA6900 (the “Representative Product”) is representative of the structure, function, and operation of Amazon Video on other devices.

2. The parties further stipulate and agree that discovery in this case regarding the design, development, structure, function, and operation (“Technical Discovery”) of Amazon Video shall be limited to Amazon Video on the Representative Product.

3. Straight Path hereby agrees that it will not pursue Technical Discovery regarding Amazon Video on devices other than the Representative Product.

4. Nothing herein shall preclude Straight Path from pursuing discovery other than Technical Discovery.

5. The parties reserve all rights to supplement, revise, correct and/or clarify this stipulation by agreement at the time and in the manner allowed under the Federal Rules of Civil Procedure, Local Rules for the United States District Court of Eastern District of Virginia, Revised Joint Proposed Discovery Plan, and the Scheduling Order.

***ENDORSEMENTS ON NEXT PAGE***

**WE STIPULATE to this as of the 13th day of October 2017.**

<p><b>AMAZON.COM, INC.</b></p> <p><u>By: /s/ Laura Anne Kuykendall</u> Robert A. Angle (VSB No. 37691) robert.angle@troutmansanders.com Laura Anne Kuykendall (VSB No. 82318) la.kuykendall@troutmansanders.com TROUTMAN SANDERS LLP 1001 Haxall Point Richmond, Virginia 23219 Telephone: (804) 697-1468 Facsimile: (804) 697-1339</p>	<p><b>STRAIGHT PATH IP GROUP, INC.</b></p> <p><u>By /s/ Craig C. Reilly</u> Craig C. Reilly (VSB # 20942) 111 Oronoco Street Alexandria, Virginia 22314 Phone: (703) 549-5354 Fax: (703) 549-5355 Email: craig.reilly@ccreillylaw.com</p>
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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of October, 2017, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) the registered users.

/s/ Laura Anne Kuykendall

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